

Torres, Francine

From: BillK@kingestate.com%inter2 [BillK@kingestate.com] on behalf of BillK@kingestate.com
Sent: Friday, August 12, 2005 7:50 AM
To: National List
Subject: Comments for Docket Number TM-0407
Attachments: ATTACHMENT.TXT

Dear Sir,

I would like to comment on current certification standards for certain items currently not on the approved list for organic wine production. The following items I feel should be reconsidered for use in "Made with Organic Grapes" classified wines:

Copper Sulfate – This product is currently allowed in vineyard use, but not allowed as a wine treatment for organic wine. This substance is the only effective treatment of hydrogen sulfide, "sulfide compounds", aroma's in wine. Once added to wine the Copper reacts with "sulfides" and precipitates out of the wine as a copper salt. Proper treatment results in no residual copper in solution. If residual copper is in solution in the wine there are ways of "fining" or removing it from the wine prior to bottling. I feel it should be evaluated again for use in wine.

Potassium Metabisulfite, also known as KMBS – This product is useful as a means of adding Sulfur Dioxide to both juice and wine. Current standards prohibit it's use for organic. There are very pure forms of this product available to the wine industry that make it attractive for use as an additive for SO2. It is much less volatile and safer than using 100% liquid SO2 for juice and wine additions. I feel it should be evaluated again for use in wine.

Thank you;
William Kremer
Winemaker

8/15/2005